

ERIC R. BRANT, THOMAS CAMPBELL,  
and BRIAN MINOR,  
  
Plaintiffs,  
  
v.  
  
SCHNEIDER NATIONAL INC.,  
SCHNEIDER NATIONAL CARRIERS  
INC., SCHNEIDER FINANCE INC., and  
DOE DEFENDANTS 1-10,  
  
Defendants.

Judge William C. Griesbach

Defendants Schneider National Carriers, Inc., *et al.* and Plaintiffs Eric Brant, Thomas Campbell, and Brian Minor, *et al.* (collectively, “the Parties”), by and through their respective counsel, respectfully move to extend the stay of this action for sixty (60) days, through the mediation scheduled with the Hon. Morton Denlow (Ret.) on October 24, 2023. In support of this motion, the Parties state as follows:

1. On May 25, 2023, the Parties informed the Court that they had engaged in preliminary discussion of whether and how this matter might be settled on behalf of the Named Plaintiffs and the approximately 130 drivers who had filed Consents to Sue. Plaintiffs will also present proposals for settlements on behalf of a Rule 23 class or classes. The Parties requested a 30-day stay of all deadlines to continue those discussions. Dkts. # 141 and 144.
2. On May 26, 2023, the Court granted the Parties' request for a 30-day stay. Dkt. # 142.
3. On June 26, 2023, the Parties informed the Court on the status of their settlement discussions and requested a 60-day further stay of all deadlines to continue such discussions. The Parties further indicated at that time that should discussions continue to prove fruitful, they may require an additional stay of proceedings to complete mediation. Dkt. # 144.

4. On June 28, 2023, the Court granted the Parties' request for a 60-day stay. Dkt. # 145.

5. The current stay will expire on Monday, August 28, 2023.

6. The Parties have scheduled a mediation with Mediator Hon. Morton Denlow (Retired) for October 24, 2023.

7. In the interim, the Parties continue to exchange documents and data relevant to computations of alleged damages, without the need for formal discovery requests. The data relevant to damages related to Plaintiffs' claims is voluminous and much of it is not maintained in any readily accessible, searchable format. The timing of mediation is based in part on the need to assess and analyze this data prior to mediation.

8. The Parties, accordingly, request that the Court stay this matter for an additional sixty (60) days, through Friday, October 27, 2023 and set a status conference after October 30, 2023 for the Parties to advise the Court of settlement status.

WHEREFORE, Defendants Schneider National Carriers, Inc., *et al.* and Plaintiffs Eric Brant, Thomas Campbell, and Brian Minor, *et al.*, respectfully request that the Court extend the stay of all proceedings in this action through and including October 27, 2023 and set a status hearing thereafter on a date and time convenient for the Court.

Dated: August 23, 2023

/s/ David D. Leishman  
State Bar No. 6307957  
Joel H. Spitz  
State Bar No. 1001301  
[jspitz@mcguirewoods.com](mailto:jspitz@mcguirewoods.com)  
Michael R. Phillips  
State Bar No. 06225845 (IL)  
[mphillips@mcguirewoods.com](mailto:mphillips@mcguirewoods.com)  
David D. Leishman  
State Bar No. 6307957 (IL)  
[dleishman@mcguirewoods.com](mailto:dleishman@mcguirewoods.com)  
MCGUIREWOODS LLP  
77 West Wacker Drive, 41<sup>st</sup> Floor  
Chicago, IL 60601

T: (312) 849-8100  
F: (312) 849-3690

Attorneys for Defendants

/s/ Emily J. Sullivan  
GETMAN, SWEENEY & DUNN, PLLC  
Emily J. Sullivan  
Matt Dunn  
260 Fair Street  
Kingston, NY 12401  
(845) 255-9370  
esullivan@getmansweeney.com  
mdunn@getmansweeney.com

Attorneys For Plaintiff

177557859\_2